

## Battaglia, Frank

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**From:** Battaglia, Frank  
**Sent:** Monday, May 20, 2019 7:49 PM  
**To:** Rick Kowalski; Crawford, Jeffrey (DEM); joseph (CIBA) guarnaccia  
**Cc:** Barbara Hicks; Stephen Graham; Aaron Ting; Tisa, Kimberly; kelly.owens.dem.ri.gov; Battaglia, Frank  
**Subject:** RE: Former Ciba-Geigy, 180 Mill street, Cranston, RI - CMI Work Plan Modification

Joe and Rick,

EPA and RIDEM were able to review your request for minor alterations to the approved final soil cover design and need some additional information and have several questions for your consideration. We need a separate figure that shows the original plan with all contouring. We need a separate figure that overlays the remaining PCB concentrations on the final grading plan (RC-7) and a separate figure that overlays the permeable and impermeable membranes on that same plan (RC-7). We need to understand why large trees with deep roots will be planted on the perimeter of the property and whether these trees will affect the cover. We need to know why the proposed change in grading will not impact storm water runoff during heavy rain events. We need a copy of the FEMA approval with all its requirements. We need a figure that illustrates where the potential parking area would be located and assurance that it would not impact the cover. Some approved language would need to be included in the ELUR/deed notice and O&M plan. We would need the RIDEM wetlands program to review and approve these alterations with respect to wetlands issues while EPA would approve the alterations based on human health protection issues and cover integrity issues. You need to check with the RIDEM wetlands program to see if you need a minor modification to the existing wetlands permit.

As Jeff said in an earlier e-mail, the submittal was a bit confusing with the parking lot future use included but EPA now needs to know whether a parking area would impact the cover and whether this can be mitigated.

Also, we have considered having a meeting at RIDEM on Tuesday June 4<sup>th</sup> around 1:00 to discuss all this with wetlands, waste management and EPA RCRA and TSCA personnel. This may not be necessary if we get more clarification on the possible impacts of these changes. Call me if you have any questions.

Frank Battaglia  
617 918-1362

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**From:** Rick Kowalski <rkowalski@aeiconsultants.com>  
**Sent:** Monday, May 13, 2019 4:55 PM  
**To:** Battaglia, Frank <battaglia.frank@epa.gov>; Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>  
**Cc:** Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Barbara Hicks <barbara.hicks@partners.basf.com>; Stephen Graham <sgraham@aeiconsultants.com>; Aaron Ting <ating@aeiconsultants.com>  
**Subject:** Former Ciba-Geigy, 180 Mill street, Cranston, RI - CMI Work Plan Modification

Frank and Jeff: Attached please find a request for approval to make some minor alterations to the approved final soil cover design, in compliance with the CMI Work Plan and FEMA approval. Please let us know if you have any questions. Thanks,

Richard G. Kowalski, CPG, LSP, CHMM  
Senior Hydrogeologist

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